

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**WRONGFUL DEATH ESTATE
OF MIGUEL GONZALEZ,
by and through Wrongful Death
Estate Personal Representative
Joanna Rodríguez,**

**JOANNA RODRIGUEZ, on her
own behalf and as
Mother and Next Friend of
ME Gonzalez, a minor child,
DJ Gonzalez, a minor child,
and AX Gonzalez, a minor child,**

Plaintiffs,

v.

CIV 18-00125 KG/LF

**BOARD OF COUNTY COMMISSIONERS
OF THE COUNTY OF BERNALILLO, NEW
MEXICO, MANUEL GONZALES, III, Sheriff
of Bernalillo County, CHARLES COGGINS, a Deputy
Sheriff of the Bernalillo County Sheriff's
Department, and JOHN DOES 1 through
7, Deputy Sheriffs (Deputy Sheriffs) of the Bernalillo
County Sheriff's Department, Individually
and in their Official Capacities,**

Defendants.

**AFFIDAVIT OF LUIS ROBLES IN REPLY TO ORDER
GRANTING COUNTY DEFENDANTS' MOTION TO COMPEL No. 1 [DOC. 40]**

Upon my oath, I, Luis Robles, attorney for the Board of County Commissioners of the County of Bernalillo, Manuel Gonzales, III, and Charles Coggins (*hereinafter* known as "County Defendants"), hereby state to the best of my personal knowledge and belief the following facts:

1. On July 12, 2018, this Court entered an Order Granting County Defendants Motion to Compel No. 1 [*Doc. 40*]. In the Order, this Court directed County Defendants to file an affidavit of fees and costs by July 25, 2018.

2. On June 5, 2018, I drafted a lengthy and detailed Rule 37 letter to counsel for the Estate, Gene Chavez, regarding the legal and factual basis of why the Estate's discovery answers to Interrogatories Nos. 2, 3, 5, and 8 were inadequate. The letter was six (6) pages in length and single spaced. I spent 5.20 hrs. on this task and billed at a rate of 160.00. The total cost was eight hundred and thirty-two dollars (\$832.00).

3. On June 6, 2018, the paralegal assigned to this matter proofread and edited the Rule 37 letter to counsel for the Estate, Gene Chavez, regarding the legal and factual basis of why the Estate's discovery answers to Interrogatories Nos. 2, 3, 5, and 8 were inadequate. The cost associated with this was a total of thirteen dollars and fifty cents (\$13.50).

4. On June 17, 2018, I drafted County Defendants' Motion to Compel No. I: Requesting Complete and Adequate Answers to Interrogatories and Responses to Requests for Production. On this date, this firm drafted the following sections of the brief: 1) Introduction; and 2) County Defendants request to the Court for the Estate to provide complete and adequate answers to County Defendants' interrogatories. I spent 5.00 hrs. on this task and billed at a rate of 160.00. The total cost was eight hundred dollars (\$800.00).

5. One June 18, 2018, I continued working on County Defendants' Motion to Compel No. I: Requesting Complete and Adequate Answers to Interrogatories and Responses to Requests for Production. On this date, I drafted the following sections of the brief: 1) County Defendants

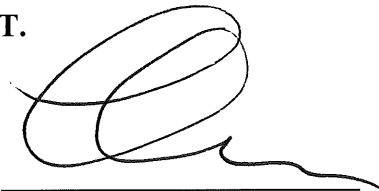
request to the Court for the Estate to provide adequate responses to County Defendants' requests for production; and 2) Conclusion. I spent 3.80 hrs. on this task and billed at a rate of 160.00. The total cost was a total of six hundred and eight dollars (\$608.00).

6. On July 5, 2018, this firm drafted a Notice of Completion of Briefing on County Defendants' Motion to Compel No. I: Requesting Complete and Adequate Answers to Interrogatories and Responses to Requests for Production. The cost associated with this was a total of nine dollars (\$9.00)

7. County Defendants' total attorney's fees accrued for the drafting and completion of their Motion to Compel No. I [Doc. 30] and Notice of Completion of Briefing on County Defendants' Motion to Compel No. I [Doc. 32] is two thousand, two hundred and sixty-two dollars and fifty cents (\$2,262.50).

8. County Defendants have not incurred any costs in making the above motions.

FURTHER AFFIANT SAYETH NAUGHT.



Luis Robles

SUBSCRIBED AND SWORN TO before me this 25th day of July 2018 by Luis Robles.


Notary Public

My Commission Expires:

05/29/2019

